

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re: Tri-State Paper, Inc., *Debtor*.

Case No. 23-13237-pmm  
Chapter 11

**Debtor's Motion for Expedited Hearing on Debtor's Motion to  
Deposit Funds Into Court Registry**

Debtor Tri-State Paper, Inc., by and through its attorney, states as follows:

1. The Debtor filed its Motion to Deposit Funds Into Court Registry (the "substantive motion") on December 21, 2023, requesting that the Court require the Debtor to deposit a check for insurance proceeds into the Court registry.
2. The substantive motion concerns a check made payable to three entities in the amount of \$679,353, all of which is intended for distribution to creditors.
3. Under the Court's standard schedule for hearings, the substantive motion cannot be heard until January 24, 2024.
4. If the Debtor must wait nearly a month to deposit the funds, it leaves the possibility for the check to be lost, stolen, or improperly deposited, which would be detrimental to the Debtor and especially its creditors.
5. Accordingly, the Court must schedule an expedited hearing on the substantive motion on January 10, 2024, at 9:30 a.m.
6. The Debtor complied with L.B.R. 5070-1(g)(1) by seeking approval for an expedited hearing from the attorney for Citizens Bank and the principal of Young Adjustment Company, Inc. Both parties agreed this request for an expedited hearing on January 10, 2024, at 9:30 a.m.
7. Because granting or denying the substantive motion does not have the potential to prejudice any parties other than Citizens Bank or Young Adjustment Company, Inc., the Court should not require the Debtor to serve the order scheduling an expedited hearing on the master creditor list.

For those reasons, the Debtor respectfully moves the Court to grant relief in the form of order attached and further in its favor, if necessary and proper under the law.

Dated: December 26, 2023

CIBIK LAW, P.C.



By:

Michael I. Assad (#330937)

Michael A. Cibik (#23110)

Edward Jacob Gruber (#334339)

1500 Walnut Street, Suite 900

Philadelphia, PA 19102

215-735-1060

mail@cibiklaw.com

*Counsel for Debtor*

*Tri-State Paper, Inc.*